

## **REMARKS**

Claims 6 and 8-12 remain in this application. Claims 6, 11 and 12 have been amended. No new matter has been added.

## **ARGUMENTS**

Applicant respectfully submits that the art of making tiles is completely different from the art of making belts or watch straps and there is no motivation in the cited art to combine the references in such different areas of technology and industry. The Most patent relates to watch straps and Hirsch relates to shoulder belts, completely unrelated to floor lining. Zegler relates to a mat with a thermoplastic layer that does not comprise leather. The only document concerning leather tiles is Liardet, which relates to a wooden layer and a leather layer which are glued together. Applicant submits that one with ordinary skill in the art of tile manufacture and design would not look to leather watch making as the problems sought to be solved in tile formation are different than for straps or belts. There is also no suggestion in the cited references to either combine such different industry areas or to seek a solution to a problem in one area by looking in the other.

Almost any invention can be obtained from a combination of features. In most cases, a document can be found showing a feature. Using the Examiner's reasoning, most inventions could be obtained from overlapping documents. Therefore, most inventions would be "non inventions".

In this case, starting from Liardet, the prior art shows a leather tile with a wooden layer, the missing features between Liardet and Applicant's invention as presented in the claims as amended:

- a) the resin plastic layer;
- b) the fact that the leather layer has a recess, so that the resin plastic layer fills the recess; and

- c) the fact that the recess is a through hole and the resin layer fills the through hole forming a pattern or a script on the first face of the leather tile.

One missing feature (the resin plastic layer) should be found in Zegler. It shows a kind of rolled up carpet with a thermoplastic layer for sealing and lining a floor. It is not clear why a person with ordinary skill in making tiles would be motivated to combine these documents to come up with the leather tile with resin layer. Applicant submits that a leather tile with a resin layer was not obvious at the time of invention.

In any case, even if the person with ordinary skill in the art were motivated to combine Liardet and Zegler, only a leather tile with resin layer would be available.

Starting from Liardet and Zegler combined together, the feature of creating a recess in the leather for making belts is shown in Hirsch. It is not clear why a person with ordinary skill in making tiles should be motivated to look for solutions in the field of belts. In any case, even if the person with ordinary skill in tiles were motivated to combine the unit formed by Liardet and Zegler with Hirsch, only a leather tile with recess and resin layer filling the recess would be available.

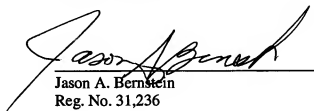
Regarding the recess in the leather has to be a through hole, starting from the combination of Liardet, Zegler and Hirsch, looking at Most, a through hole can be made in a bracelet (of metal) and filled with resin. Again, there is no motivation explained by the Examiner for person with ordinary skill in tiles to look in the technology of making bracelets of metal and introduce this modification in the technology of making tiles.

Therefore, Applicant respectfully traverses the rejections and maintains that the invention as presently claimed is not obvious.

## CONCLUSION

Applicant submits that the patent application is in condition for examination and allowance and respectfully requests such actions. If the Examiner has any questions that can be answered by telephone, please contact the patent attorney of record at the telephone number listed below.

Respectfully submitted,  
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